

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 15-10050-NMG
	)	
DANIEL THIBEAULT	)	
GL CAPITAL PARTNERS, LLC	)	
GL INVESTMENT SERVICES, LLC	)	
GRADUATE LEVERAGE, LLC (d/b/a GL	)	
ADVISOR and GL HOLDINGS CORP.)	)	
TAFT FINANCIAL SERVICES, LLC	)	
	)	
Defendants,	)	
and	)	
	)	
SHAWNET THIBEAULT,	)	
GL ADVISOR SOLUTIONS, INC.	)	
	)	
Relief Defendants.	)	
	)	

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**MOTION OF THE UNITED STATES (DEPARTMENT OF JUSTICE)  
FOR LEAVE TO INTERVENE AND  
FILE RESPONSE TO MOTION FOR INSTRUCTIONS**

The United States Department of Justice (the “United States”), by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, respectfully moves to intervene in this action for the limited purpose of filing a response to the Motion for Instructions filed by Bank of America on September 15, 2016, for the reasons stated below.<sup>1</sup> See Docket No. 164.

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<sup>1</sup> The Court previously granted the United States’ motion to intervene for the limited purpose of moving to stay these proceedings pending resolution of the parallel federal criminal proceedings, and subsequently granted the government’s motion for a stay. See Docket No. 75.

*Motion allowed. SBN/Boston, USDI 12/21/16*